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MP139 'IVP and MVP dates for CHTS'

Modification Report

Version 0.3

13 October 2020

Corporate member of
Plain English Campaign
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communication

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About this document

This document is a Modification Report. It currently sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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This document also has one annex:

- **Annex A** contains the redlined changes to the SEC required to deliver the Proposed Solution.

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1. Summary

This proposal has been raised by Sasha Townsend from the Data Communications Company (DCC).

The Smart Energy Code (SEC) contains a number of Technical Specifications. Schedule 11 'Technical Specifications Applicability Tables' (TSAT) specifies the dates in which Devices built to these specifications can be installed (the Installation Validity Period (IVP)) and maintained (the Maintenance Validity Period (MVP)).

There are three issues that the Proposer is looking to address:

- The first issue relates to Communication Hub (CH) stock compliant to the Communications Hub Technical Specifications (CHTS) v1.0 and the GB Companion Specification (GBCS) v1.0 & v1.1 being held in volume and unlikely to be installed before the IVP end date of 31 January 2021.
- The second issue relates to CHTS v1.1 / GBCS v2.1 Communications Hubs needing to be installed by 28 February 2021, the GBCS v2.0 Applicability Period end date.
- The third issue focuses on the need to upgrade or replace installed CHTS v1.1 / GBCS v2.1 Communications Hubs (to CHTS v1.3 / GBCS v3.2 Communications Hubs) by 31 May 2021, the CHTS v1.1 MVP end date.

The Proposer believes that Single Band Communications Hubs (SBCH) and Dual Band Communications Hubs (DBCH) will become non-compliant if the current IVP and MVP end dates remain. This will lead to a high risk that Energy Suppliers will have stock that they can no longer install, therefore, will need to be scrapped.

The proposed solution is to extend the affected IVP and MVP end dates by 12 months to allow Suppliers holding stocks of these Devices to install them and make the necessary updates before the IVP and MVP end dates. This modification will not impact DCC Systems and therefore the costs are limited to SECAS time and effort. Large Suppliers, Small Suppliers, and the DCC will be impacted. This change is targeted for implementation in an ad-hoc SEC Release in January 2021. This is a Self-Governance Modification.

2. Issue

What are the current arrangements?

The SEC sets out the Smart Metering Technical Specifications, including the CHTS and the GBCS. Schedule 11 'Technical Specification Applicability Tables' specifies the dates in which Devices built to these specifications can be installed (the IVP) and maintained (the MVP). The TSAT also specifies the Applicability Period end date for the relevant version of GBCS. This means the date by which Parties should have taken all reasonable steps to ensure a Device is no longer operating on that version of GBCS.

Table 3 of the TSAT, shown below, set outs the IVP, MVP and Applicability dates for CHTS and GBCS.

Table 3 CHTS and Relevant Versions of GBCS

CHTS Version	Installation Start Date	Installation End Date	Maintenance Start Date	Maintenance End Date	Relevant GBCS Version	Applicability Period Start Date	Applicability Period End Date
1.0	30/09/16	Not determined	30/09/16	Not determined	1.0	30/09/16	07/05/18
1.0	30/09/16	31/01/21	30/09/16	28/02/21	1.1	06/11/17	Not determined
1.1	28/10/18	Not determined	28/10/18	Not determined	2.0	28/10/18	28/02/21
1.1	28/10/18	30/04/21	28/10/18	31/05/21	2.1	28/10/18	Not determined
1.2	Not determined	Not determined	Not determined	Not determined	3.0	Not determined	05/06/18
1.2	Not determined	Not determined	Not determined	Not determined	3.1	Not determined	04/07/19
1.2	07/11/19	Not determined	07/11/19	04/07/19	3.2	Not determined	Not determined
1.3	29/11/19	Not determined	29/11/19	Not determined	3.2	29/11/19	Not determined

What is the issue?

There are three issues:

Issue 1: Uninstalled CHTS v1.0 Communications Hubs.

This issue relates to Communication Hub stock compliant to CHTS v1.0 and GBCS v1.0 & v1.1 being held in volume and unlikely to be installed before the IVP end date of 31 January 2021.

The DCC Release 1 Communications Hubs across all regions were manufactured to CHTS v1.0 with firmware versions supporting both GBCS v1.0 and GBCS v1.1. Some of these remain in warehouses pending installation. Until they have been successfully installed and commissioned, these cannot be upgraded to a compliant CHTS v1.1 baseline. This means all those held in stock will need to be installed by the IVP end date of 31 January 2021.

Issue 2: Delays in Communications Hub firmware deployment to upgrade from GBCS v2.0 to GBCS v2.1.

This issue relates to the need to upgrade or replace installed CHTS v1.1 / GBCS v2.0 Communications Hubs to CHTS v1.1 / GBCS v2.1 Communications Hubs by 28 February 2021 (the GBCS v2.0 Applicability Period end date). The Proposer believes it will not be possible to achieve this due to delays in CHTS v1.1 / GBCS v2.1 Communications Hub firmware deployment.

CSP North

GBCS v2.0 compliant firmware for the SBCHs in the Communication Service Provider (CSP) North Region was made available on the Central Product List (CPL) in July 2020. Mass Over-the-Air (OTA) updates are due to be deployed from late September 2020, which are anticipated to take several months to complete.

GBCS v2.1 compliant SBCH firmware in the North Region will not be available until March 2021. This date is after the 28 February 2021 Applicability Period end date for CHTS v1.1 / GBCS v2.0. From March 2021, mass OTA updates will be required to upgrade the production estate onto the GBCS v2.1 compliant firmware, which is anticipated to take several months.

GBCS v2.0 compliant firmware for the DBCHs in the CSP North Region was due on the CPL in August 2020, with the GBCS v2.1 compliant firmware not expected to be available until February 2021 at the earliest.

This means the current GBCS v2.0 Applicability Period end date of 28 February 2021 is not compatible for either Single Band or Dual Band in the CSP North Region. It also means that the CHTS v1.1 / GBCS v2.1 IVP end date will not be sufficient to upgrade or replace these Communications Hubs.

CSP Central & South

DBCHs compliant with CHTS v1.1 and GBCS v2.1 in the Central & South Region will be made available in production from November 2020. Based on the forecasts provided by Suppliers, it is estimated that installations of GBCS v2.1 compliant DBCHs are extremely unlikely to be completed by the current CHTS v1.1 / GBCS v2.1 IVP end date of 30 April 2021.

Issue 3: Upgrades to CHTS v1.1 / GBCS v2.1 Communications Hubs

This issue relates to the need to upgrade or replace installed CHTS v1.1 / GBCS v2.1 Communications Hubs (to CHTS v1.3 / GBCS v3.2 Communications Hubs) by 31 May 2021 (the CHTS v1.1 Maintenance Validity Period end date). The Proposer believes it will not be possible to achieve this due to delays in CHTS v1.3 / GBCS v3.2 Communications Hub firmware deployment.

Furthermore, due to re-plans of CHTS v1.3 and GBCS v3.2 compliant Communications Hubs firmware, the MVP end date will not be sufficient. This is because the full set of firmware releases across Single Band and Dual Band as well as all three Communications Hub providers will not all be available on the CPL and the existing estates upgraded before the current CHTS v1.1 / GBCS v2.1 MVP end date of 31 May 2021.

What is the impact this is having?

The Proposer believes the current Applicability Period end date for GBCS v2.0 and the IVP/MVP end dates for CHTS v1.1 / GBCS v2.1 means there is a risk that Communications Hubs will be non-compliant with a version of CHTS and GBCS with valid end dates.

Furthermore, if the current IVP end dates remain, there is a high risk that Suppliers will have stock that they can no longer install, which therefore will need to be scrapped. The Proposer also believes there is a high risk that there will be a period where Suppliers can no longer install Communications Hubs due to CHTS v1.3 and GBCS v3.2 compliant Communications Hubs not being available.

3. Solution

Proposed Solution

DCC are proposing to extend four dates in SEC Schedule 11 (Technical Specification Applicability Tables) by 12 months:

- CHTS v1.0/GBCS v1.1 IVP date will be extended from 31/01/21 to 31/01/22
- CHTS v1.1/GBCS v2.0 Applicability Date will be extended from 28/02/21 to 28/02/22
- CHTS v1.1/GBCS v2.1 IVP will be extended from 30/04/21 to 30/04/22
- CHTS v1.1/GBCS v2.1 MVP will be extended from 31/05/21 to 31/05/22.

This will allow Suppliers more time to install or/and upgrade their currently held stocks of Communications Hubs.

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
✓	Large Suppliers	✓	Small Suppliers
	Electricity Network Operators		Gas Network Operators
	Other SEC Parties	✓	DCC

Large Suppliers and Small Suppliers will be impacted as if this change is not made, they will have stock that they can no longer install or upgrade and will most likely need to be scrapped.

DCC System

There is no impact on DCC Systems.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Schedule 11 'Technical Specifications Applicability Tables'
- The changes to the SEC required to deliver the proposed solution can be found in Annex A.

Consumers

Consumers will benefit from this modification as if the proposed dates are not changed consumers may need to have Communications Hubs replaced which will involve the inconvenience of a site visit and additional cost to the Smart Metering programme as a whole, which will eventually flow through to the Consumer.

Other industry Codes

There are no impacts on other industry Codes in this modification.

Greenhouse gas emissions

There are no impacts on greenhouse gas emissions in this modification.

5. Costs

DCC costs

There are no DCC costs to implement this modification

SECAS costs

The estimated the Smart Energy Code Administrator and Secretariat (SECAS) costs to implement this modification is two days of effort, amounting to approximately £1,200. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

There are no anticipated costs on SEC Parties.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- Ten Working Days after decision.

This is a document only change and needs to be implemented before the first IVP end date which is 31 January 2021, requiring an ad-hoc SEC Release.

7. Assessment of the proposal

Observations on the issue

The Change Sub-Committee (CSC) agreed the issue was clear. CSC members had no specific comments or questions regarding the modification. The CSC agreed with the recommendation to convert the Draft Proposal to a Modification Proposal.

Members noted the solution seemed self-evident and could theoretically proceed straight to the Report Phase. However, the Proposer queried whether the TSAT should be made Region-specific, which the CSC agreed would need to be discussed in the Refinement Process. Members encouraged this period be kept short so a timely decision on the proposal could be made.

The Security Sub-Committee (SSC) also stated an interest in the progress of the modification, as it noted that an overextension of IVP and MVP dates could potentially present security risks. This would particularly be where Issue Resolution Proposals (IRPs) and Change Request Proposals (CRPs) had been implemented in later versions to the technical specifications to resolve security issues.

Solution development

DCC completed analysis on the levels of stock (CHTS v1.0 and GBCS v1.1) being held by industry and the 'run down' rates of this stock. 12 months would be the minimum time required for SEC Parties to install this stock and following feedback from SSC, DCC notes that there may be a security risk if the date is extended any further.

The Working Group agreed with the DCC's proposal to extend the relevant dates by 12 months. The DCC noted the urgency in progressing this modification, due to the imminent IVP and MVP dates noted in the issue and the TSAT. The DCC noted that if this issue is not addressed, they expect Suppliers will not be able to install their remaining Communications Hub stock by the end of the current dates.

Views against the General SEC Objectives

Proposer's views

The Proposer believes this Modification better facilitates SEC Objective (a)¹ as it will prevent Communications Hubs being scrapped and will help to better facilitate the efficient provision and installation of smart metering systems.

¹ Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.

Appendix 1: Progression timetable

The SEC Panel agreed with the recommendation to convert the proposal to Modification Report. The Refinement Consultation will be issued w/c 19 October 2020.

Timetable	
Event/Action	Date
Draft Proposal raised	18 Aug 2020
Presented to CSC for final comment and recommendations	28 Aug 2020
Panel converts Draft Proposal to Modification Proposal	11 Sep 2020
Modification discussed with Working Group	7 Oct 2020
Refinement Consultation	19 Oct – 30 Oct 2020
Proposed solution discussed with Security Sub-Committee	28 Oct 2020
Modification Report approved by Panel	13 Nov 2020

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
CRP	Change Request Proposal
CSC	Change Sub-Committee
CSP	Central Service Provider
DCC	Data Communications Company
DBCH	Dual Band Communications Hubs
GBCS	Great Britain Companion Specification
IRP	Issue Resolution Proposal
IVP	Installation Validity Period
MVP	Maintenance Validity Period
OTA	Over the Air
SBCH	Single Band Communications Hub
SEC	Smart Energy Code
SMETS	Smart Metering Equipment Technical Specifications
SSC	Security Sub-Committee
TSAT	Technical Specifications Applicability Tables